



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

5E
357132

May 14, 2001

Michael Christie, P.G.
Vice President
Penn E&R
2755 Bergey Road
Hatfield, PA 19440

Dear Mr. Christie:

This letter is in reference to the *Remedial Design Work Plan to Cap the Cinder/Slag Fill Area Located on Liberty Property Trust's 2301 Renaissance Boulevard Property*, submitted to EPA by Penn E&R on April 23, 2001 for the Crater Resources Site ("Site").

EPA forwarded its comments in a letter dated May 8, 2001. PADEP's comments are provided below:

Page 2-3 2nd Paragraph:

12 ounce geotextile should not be construed as a drainage layer. Reference to figure 2 is made and that figure should be revised to include the following:

-Waste should be covered by random fill to level the grade, followed by 6 inches minimum select fill (no stones or rock larger than 1 inch in size, and not angular or sharp edges), 40 mil PVC liner (as proposed), a drainage layer consisting geonet, 12 ounce geotextile to prevent fines entering the geonet, 2 feet of random fill and then 6 inches of topsoil as a vegetative cover.

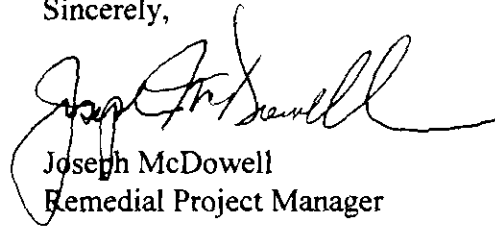
-Drainage layer should be below the frost line. Instead of vegetative cover, if Penn E & R is proposing a parking lot, they must demonstrate that the drainage layer/liner will be below the frost line, runoff from the parking lot will be addressed adequately with the best management practices of storm water. A minimum of 3% slope should be maintained for the positive run off and allowance for any settlement in the waste.

-Report has mentioned the extensive experience of the liner installer at various sites, it does not include any QA/QC requirements, or how often any testing will be done on the installed liner, soil compaction etc. etc.

-Figure-1 shows everything on the site and at this time it is very hard to configure the existing contour and final contour lines, it doesn't reflect where the cut will be made, or fill will be placed, etc. Any soil coming from outside this area? If not, is soil/waste going outside this area?

Please contact me at (215) 814-3192 should you have any questions or comments on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe McDowell", written over the printed name and title.

Joseph McDowell
Remedial Project Manager

cc: A. Duchovanny (EPA)
D. Minsker (PADEP)
B Hartlein (Liberty)
J. Bartlett (EAC)